

UNITED STATES DISTRICT COURT

for the

Central District of California

In the Matter of the Search of)
United States Postal Service (“USPS”) parcels)
seized from the mail stream between January 28,) Case No. 2:25-MJ-00525
2025 and January 31, 2025, as further described in)
Attachment A)

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Possession with intent to distribute and distribution of controlled substances
21 U.S.C. § 846	Conspiracy to distribute controlled substances
21 U.S.C. § 843(b)	Unlawful use of a communication facility to facilitate the distribution of controlled substances

The application is based on these facts:

See attached Affidavit

- Continued on the attached sheet.

Delayed notice of ____ days (*give exact ending date if more than 30 days: _____*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 2/6/25

Judge's signature

City and state: Los Angeles, CA

Hon. Alicia G. Rosenberg, U.S.M.J.

Printed name and title

AUSA: Matt Coe-Odess (x8957)

ATTACHMENT A

PARCELS TO BE SEARCHED

The following United States Postal Service ("USPS") parcels seized from the mail stream Between January 28, 2025, and January 31, 2025, are currently in the custody of the United States Postal Inspection Service in City of Industry, California:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail Express parcel bearing tracking number EI 229 945 492 US. **SUBJECT PARCEL 1** is a white colored, USPS Padded Flat Rate Envelope. **SUBJECT PARCEL 1** is addressed to "Alonso Galvan, 10861 Pine Ave, Lynwood, CA 90262." The return address listed on **SUBJECT PARCEL 1** is "Leonardo Rios, 5802 84 ½ Ave N, Minneapolis, MN 55443." **SUBJECT PARCEL 1** was postmarked on January 30, 2025, in the 55303 zip code.

b. **SUBJECT PARCEL 2** is a USPS Priority Mail Express parcel bearing tracking number EI 911 643 558 US. **SUBJECT PARCEL 2** is brown colored cardboard box with excessive amounts of duct tape. **SUBJECT PARCEL 2** is addressed to "Thomas Cong, 1042 E Almond Ave, Orange, CA 92866." The return address listed on **SUBJECT PARCEL 2** is "Willy Darrow, 4628 Turnerville Rd, Bedford, WY 83112." **SUBJECT PARCEL 2** was postmarked on January 29, 2025, in the 83127 zip code.

c. **SUBJECT PARCEL 3** is a USPS Priority Mail Express parcel bearing tracking number ER 134 456 534 US. **SUBJECT PARCEL 3** is a brown colored, FedEx cardboard box. **SUBJECT PARCEL 3** is addressed to "Johanna Santiago, 14595 Countrywood

Lane, Irvine, California 92604." The return address listed on **SUBJECT PARCEL 3** is "Diaz Silva, Calle Chipre F-1, Caguas, PR 00727." **SUBJECT PARCEL 3** was postmarked on January 28, 2025, in the 00725 zip code.

d. **SUBJECT PARCEL 4** is a USPS Priority Mail parcel bearing tracking number 9505 5163 2182 5030 3960 41. **SUBJECT PARCEL 4** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 4** is addressed to "G. Chavez, 14623 Studebaker Rd., Norwalk, CA 90650." The return address listed on **SUBJECT PARCEL 4** is "Brittney Smith, 1422 West Grand Ave., Dayton Oh. 45402." **SUBJECT PARCEL 4** was postmarked on January 30, 2025, in the 45417 zip code.

e. **SUBJECT PARCEL 5** is a USPS Priority Mail Express parcel bearing tracking number ER 121 985 921 US. **SUBJECT PARCEL 5** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 5** is addressed to "G. Chavez, 14623 Studebaker Rd., Norwalk, CA 90650." The return address listed on **SUBJECT PARCEL 5** is "Brittney Smith, 1422 West Grand Ave., Dayton, Oh. 45402." **SUBJECT PARCEL 5** was postmarked on January 30, 2025, in the 45459 zip code.

f. **SUBJECT PARCEL 6** is a USPS Priority Mail Express parcel bearing tracking number EI 991 827 615 US. **SUBJECT PARCEL 6** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 6** is addressed to "Ivan Rojas, 1622 S Poplar st, Santa Ana California 92704." The return address listed on **SUBJECT PARCEL 6** is "Bryan Hernandez, 2584 Woodhill Dr, Lexington, KY 40509." **SUBJECT PARCEL 6** was postmarked on January 29, 2025, in

the 40505 zip code.

g. **SUBJECT PARCEL 7** is a USPS Priority Mail Express parcel bearing tracking number EI 979 728 322 US. **SUBJECT PARCEL 7** is a white colored, USPS Regional Rate Box A. **SUBJECT PARCEL 7** is addressed to "Stanley Chen, 1401 WILCOX AVE, MONTEREY PARK, CA 91755." The return address listed on **SUBJECT PARCEL 7** is "Liu LiLing, 45-15 BROWVALE, LITTLE NECK. NY 11362." **SUBJECT PARCEL 7** was postmarked on January 30, 2025, in the 11362 zip code.

h. **SUBJECT PARCEL 8** is a USPS Priority Mail Express parcel bearing tracking number EI 329 267 096 US. **SUBJECT PARCEL 8** is a brown colored, HP Chromebook cardboard box. **SUBJECT PARCEL 8** is addressed to "Romario Haughton, 2028 E 5th st, Ontartio Ca 91764." The return address listed on **SUBJECT PARCEL 8** is "Dwyene Hents, 2878 Filbert St, Raleigh NC 27610." **SUBJECT PARCEL 8** was postmarked on January 27, 2025, in the 27529 zip code.

i. **SUBJECT PARCEL 9** is a USPS Priority Mail parcel bearing tracking number 9505 5113 3042 5028 9022 97. **SUBJECT PARCEL 9** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 9** is addressed to "HHC Electronics, 1338 Electra Ave, Rowland Heights, CA. 91748-2335." The return address listed on **SUBJECT PARCEL 9** is "Willard, 745 E. Chicago St, Elgin IL 60120." **SUBJECT PARCEL 9** was postmarked on January 28, 2025, in the 60143 zip code.

j. **SUBJECT PARCEL 10** is a USPS Priority Mail Express parcel bearing tracking number EI 504 095 603 US. **SUBJECT**

PARCEL 10 is a white colored, medium-sized USPS Mailing Box.

SUBJECT PARCEL 10 is addressed to "Yesenia Jara, 2718 ½ Lanfranco Street, Los Angeles, California 90033-4427." The return address listed on **SUBJECT PARCEL 10** is "Longwood Beauty Supply, 15740 Broadway Ave., Maple Heights, Ohio 44137." **SUBJECT PARCEL 10** was postmarked on January 30, 2025, in the 44101 zip code.

ATTACHMENT B

ITEMS TO BE SEIZED

The items to be seized are evidence, contraband, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "**Subject Offenses**"), namely:

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Parcel wrappings, and any associated packaging material.

AFFIDAVIT

I, Zachary Sumpter, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of an application for a warrant to search the following eight United States Postal Service ("USPS") Priority Mail Express parcels and two USPS Priority Mail parcels in the custody of the United States Postal Inspection Service ("USPIS") in City of Industry, California, within the Central District of California (collectively, the "**SUBJECT PARCELS**"), as described more fully in Attachment A:

a. A USPS Priority Mail Express parcel bearing tracking number EI 229 945 492 US ("**SUBJECT PARCEL 1**");

b. A USPS Priority Mail Express parcel bearing tracking number EI 911 643 558 US ("**SUBJECT PARCEL 2**");

c. A USPS Priority Mail Express parcel bearing tracking number ER 134 456 534 US ("**SUBJECT PARCEL 3**");

d. A USPS Priority Mail parcel bearing tracking number 9505 5163 2182 5030 3960 41 ("**SUBJECT PARCEL 4**");

e. A USPS Priority Mail Express parcel bearing tracking number ER 121 985 921 US ("**SUBJECT PARCEL 5**");

f. A USPS Priority Mail Express parcel bearing tracking number EI 991 827 615 US ("**SUBJECT PARCEL 6**");

g. A USPS Priority Mail Express parcel bearing tracking number EI 979 728 322 US ("**SUBJECT PARCEL 7**");

h. A USPS Priority Mail Express parcel bearing tracking number EI 329 267 096 US ("**SUBJECT PARCEL 8**");

i. A USPS Priority Mail parcel bearing tracking number 9505 5113 3042 5028 9022 97 ("SUBJECT PARCEL 9"); and

j. A USPS Priority Mail Express parcel bearing tracking number EI 504 095 603 US ("SUBJECT PARCEL 10").

2. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), as described more fully in Attachment B.

Attachments A and B are incorporated by reference herein.

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. TRAINING AND EXPERIENCE

4. I am a Task Force Officer ("TFO") with the United States Postal Inspection Service ("USPIS") and have been so since November 2021. I am currently assigned as a TFO to the

Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking involving the United States Mail. Accordingly, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Prior to being assigned as a TFO with the USPIS, I worked patrol as a full-time sworn law enforcement officer with the Chino Police Department.

5. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws. I have been involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and importation of controlled substances, and the laundering of drug proceeds. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am familiar with how drug traffickers use

counter-surveillance techniques to avoid detection by law enforcement.

III. SUMMARY OF PROBABLE CAUSE

6. Between January 28, 2025, and January 31, 2025, during routine parcel inspections at the City of Industry USPS Processing and Distribution Center in Los Angeles County, California, I identified the **SUBJECT PARCELS** as meeting some of the following criteria common to packages containing contraband, including that they were excessively taped, contained handwritten labels, lacked business account numbers, and, according to law enforcement databases, contained some sender and recipient names that were not associated with their respective listed addresses.

7. Additionally, on February 4, 2025, a trained drug detection dog alerted to each of the **SUBJECT PARCELS** for the presence of drugs or other items, such as the proceeds of drug sales that have been contaminated by drugs.

IV. STATEMENT OF PROBABLE CAUSE

A. Background on Use of Mails for Drug Trafficking

8. Based on my training and experience as a TFO, and the experiences related to me by Postal Inspectors who specialize in drug investigations, I know the following:

a. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, began conducting organized interdictions of Priority Mail Express and Priority

Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

b. Although Postal Inspectors still see boxes used to send for controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel's appearance.

c. Los Angeles is a significant source area for controlled substances. Controlled substances are frequently transported from the Los Angeles area via US Mail, and the proceeds from the sale of controlled substances are frequently returned to the Los Angeles area via US Mail. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in an amount over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of drugs because they have been contaminated by or associated with the odor of one or more drugs.

d. Drug distributors often use USPS Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug distributors use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to delivery. Drug distributors use the Priority Mail delivery service because it provides them more time for travel between states if they decide to follow their shipments to their destination for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers have the ability to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail 2-Day Service.

9. The following indicia suggest that a parcel may contain drugs or drug distribution proceeds:

- a. The parcel is contained in a Large Flat Rate cardboard box;
- b. The parcel bears a handwritten or typed label, whether USPS Express Mail or Priority Mail;
- c. The handwritten or typed label on the parcel does not contain a business account number;
- d. The seams of the parcel are all taped or glued shut;
- e. The parcel emits an odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and

f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

10. Parcels exhibiting such indicia may be subject to further investigation, which may include verification of the addressee and return addresses.

11. I know from my training and experience that drug traffickers often use fictitious or incomplete names and addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases. To the extent that real addresses are ever used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

B. Initial Investigation of the SUBJECT PARCELS

12. Between January 28, 2025, and January 31, 2025, during routine parcel inspections at the City of Industry USPS Processing and Distribution Center in Los Angeles County, California, I determined that the **SUBJECT PARCELS** met some of the initial suspicious characteristics as described above. Specifically, I determined the following:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail Express parcel bearing tracking number EI 229 945 492 US. **SUBJECT PARCEL 1** is a white colored, USPS Padded Flat Rate Envelope. **SUBJECT PARCEL 1** has a handwritten label and does not contain a business account number. According to law enforcement records, the return address listed on **SUBJECT PARCEL 1** - "5802 84 ½ Ave N, Minneapolis, MN 55443" - appears to be a legitimate address but is not associated with the listed sender, "Leonardo Rios."

The recipient address listed on **SUBJECT PARCEL 1** - "10861 Pine Ave, Lynwood, CA 90262" - appears to be a legitimate address but is not associated with the listed recipient, "Alonso Galvan."

b. **SUBJECT PARCEL 2** is a USPS Priority Mail Express parcel bearing tracking number EI 911 643 558 US. **SUBJECT PARCEL 2** is brown colored cardboard box with excessive amounts of duct tape. **SUBJECT PARCEL 2** has a handwritten label and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 2** - "4628 Turnerville Rd, Bedford, WY 83112" appears to be a legitimate address, and is associated with the listed sender, "Willy Darrow." The recipient address listed on **SUBJECT PARCEL 2** - "1042 E Almond Ave, Orange, CA 92866" appears to be a legitimate address, but is not associated with the listed recipient, "Thomas Cong."

c. **SUBJECT PARCEL 3** is a USPS Priority Mail Express parcel bearing tracking number ER 134 456 534 US. **SUBJECT PARCEL 3** is a brown colored, FedEx cardboard box. **SUBJECT PARCEL 3** has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 3** - "Calle Chipre F-1, Caguas, PR 00727" appears to be legitimate address, but is not associated with the listed sender, "Diaz Silva." The recipient address listed on **SUBJECT PARCEL 3** - "14595 Countrywood Lane, Irvine, California 92604" appears to be a legitimate address, and is associated with the listed recipient, "Johanna Santiago."

d. **SUBJECT PARCEL 4** is a USPS Priority Mail parcel bearing tracking number 9505 5163 2182 5030 3960 41. **SUBJECT PARCEL 4** is a white colored, large-sized USPS Flat Rate Box. **SUBJECT PARCEL 4** has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 4** - "1422 West Grand Ave., Dayton Oh. 45402," appears to be legitimate address, but is not associated with the listed sender, "Brittney Smith." The recipient address listed on **SUBJECT PARCEL 4** - "14623 Studebaker Rd., Norwalk, CA 90650," appears to be a legitimate address, and is associated with the listed recipient, "G. Chavez."

e. **SUBJECT PARCEL 5** is a USPS Priority Mail Express parcel bearing tracking number ER 121 985 921 US. **SUBJECT PARCEL 5** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 5** has copious amounts of tape, a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 5** - "1422 West Grand Ave., Dayton, Oh. 45402" appears to be legitimate address, but is not associated with the listed sender, "Brittney Smith." The recipient address listed on **SUBJECT PARCEL 5** - "14623 Studebaker Rd., Norwalk, CA 90650" appears to be a legitimate address, and is associated with the listed recipient, "G. Chavez."

f. **SUBJECT PARCEL 6** is a USPS Priority Mail Express parcel bearing tracking number EI 991 827 615 US. **SUBJECT PARCEL 6** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 6** has a handwritten label, and does not contain a

business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 6** - "2584 Woodhill Dr, Lexington, KY 40509" appears to be legitimate address, but is not associated with the listed sender, "Bryan Hernandez." The recipient address listed on **SUBJECT PARCEL 6** - "1622 S Poplar st, Santa Ana California 92704" appears to be a legitimate address, and is associated with the listed recipient, "Ivan Rojas."

g. **SUBJECT PARCEL 7** is a USPS Priority Mail Express parcel bearing tracking number EI 979 728 322 US. **SUBJECT PARCEL 7** is a white colored, USPS Regional Rate Box A. **SUBJECT PARCEL 7** has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 7** - "45-15 BROWVALE, LITTLE NECK. NY 11362," appears to be legitimate address, and is associated with the listed sender, "Liu LiLing." The recipient address listed on **SUBJECT PARCEL 7** - "1401 WILCOX AVE, MONTEREY PARK, CA 91755" appears to be a legitimate address, and is associated with the listed recipient, "Stanley Chen."

h. **SUBJECT PARCEL 8** is a USPS Priority Mail Express parcel bearing tracking number EI 329 267 096 US. **SUBJECT PARCEL 8** is a brown colored, HP Chromebook cardboard box. **SUBJECT PARCEL 8** has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 8** - "2878 Filbert St, Raleigh NC 27610," appears to be legitimate address, and is associated with the listed sender, "Dwyene Hents." The

recipient address listed on **SUBJECT PARCEL 8** - "2028 E 5th st, Ontario Ca 91764," appears to be legitimate address, and is not associated with the listed sender, "Romario Haughton."

i. **SUBJECT PARCEL 9** is a USPS Priority Mail parcel bearing tracking number 9505 5113 3042 5028 9022 97. **SUBJECT PARCEL 9** is a white colored, medium-sized USPS Flat Rate Box. **SUBJECT PARCEL 9** is wrapped in clear tape, has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 9** - "745 E. Chicago St, Elgin IL 60120" appears to be legitimate address, but is not associated with the listed sender, "Willard." The recipient address listed on **SUBJECT PARCEL 9** - "1338 Electra Ave, Rowland Heights, CA. 91748-2335," appears to be legitimate address, and is associated with the listed sender, "HHC Electronics."

j. **SUBJECT PARCEL 10** is a USPS Priority Mail Express parcel bearing tracking number EI 504 095 603 US. **SUBJECT PARCEL 10** is a white colored, medium-sized USPS Mailing Box. **SUBJECT PARCEL 10** is wrapped in clear tape, has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 10** - "15740 Broadway Ave., Maple Heights, Ohio 44137" appears to be legitimate address, and is not associated with the listed sender, "Longwood Beauty Supply." The recipient address listed on **SUBJECT PARCEL 10** - "2718 ½ Lanfranco Street, Los Angeles, California 90033-4427" appears to be legitimate address, but is not associated with the listed sender, "Yesenia

Jara."

C. Drug-Detection Dog Alerts to the SUBJECT PARCELS

13. On February 4, 2025, based on the suspicious characteristics of the SUBJECT PARCELS, El Monte Police Department Officer Adam Girgle had his trained drug detection dog, "Kash," examine the exterior of the **SUBJECT PARCELS**. I learned from Officer Girgle that Kash gave a positive alert to **SUBJECT PARCEL 1 through SUBJECT PARCEL 10** separately, indicating the presence of controlled substances or other items, such as the proceeds of controlled substances, which have been recently contaminated with the odor of controlled substances. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, are documents setting forth information provided by Officer Girgle regarding Kash's training and history in detecting controlled substances, and the examination of **SUBJECT PARCELS 1 through 10**.

V. CONCLUSION

14. For the reasons above, there is probable cause to believe that the **SUBJECT PARCELS**, as described in Attachment A, contain evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance), as described in Attachment B.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 6th day of
February 2025.

HONORABLE ALICIA G. ROSENBERG
UNITED STATES MAGISTRATE JUDGE

K-9

Affidavit

AFFIDAVIT

I, Officer Adam Girgle, being duly sworn, declare and state as follows:

I have been a Police Officer with the El Monte Police Department since December of 2003. I have handled and/or assisted with hundreds of narcotics investigations. I have assisted Federal and State narcotics task forces with large scale narcotics investigations. I graduated from the Los Angeles County Sheriff's Department Academy in May of 2001. I attended the Adlerhorst Police Canine Handler course in August of 2016.

I also attended the Gold Coast Canine Narcotics Detection course in February of 2024. During these courses, my police canine partner Kash and I received 240 hours of instruction in the detection of the odor of illegal narcotics. During these courses, I personally observed my police canine partner Kash alert to the presence of the odor of illegal narcotics. My police canine partner Kash was certified to alert to the presence of marijuana, methamphetamine, cocaine, heroin and fentanyl. My police canine partner and I receive yearly certification from the Los Angeles County Police Canine Association in narcotics detection. My police canine partner and I last certified in February 2024.

I am familiar and knowledgeable in the behaviors my police canine partner Kash engages in when he detects the presence of the odor of illegal narcotics. I conduct continual training with my police canine partner Kash by hiding various narcotics in different locations such as buildings, vehicles, bags, parcels and in open areas. This training includes proofing canine Kash on odors such as plastic, boxes, latex, tape, metal, currency (circulated and uncirculated), parcel packaging material, glass pipes and food. I also proof canine Kash of my human odor. This training is on-going and continual.

On February 4, 2025, my police canine partner and I assisted with a narcotic parcel investigation. Canine Kash alerted to the presence of the odor of illegal narcotics emitting from the following parcels.

USPS Parcel: EI 229 945 492 US (Parcel 1)

Addressed To: Alonso Galvan

10861 Pine Ave.

Lynwood, CA 90262

USPS Parcel: EI 911 643 558 US (Parcel 2)

Addressed To: Thomas Cong

1042 E Almond Ave.

Orange, CA 92866

USPS Parcel: ER 134 456 534 US (Parcel 3)

Addressed To: Johanna Santiago

14595 Countrywood Lane

Irvine, CA 92604

USPS Parcel: 9505 5163 2182 5030 3960 41 (Parcel 4)

Addressed To: G. Chavez

14623 Studebaker Rd.

Norwalk, CA 90650

USPS Parcel: ER 121 985 921 US (Parcel 5)

Addressed To: G. Chavez

14623 Studebaker Rd.

Norwalk, CA 90650

USPS Parcel: EI 911 827 615 US (Parcel 6)

Addressed To: Ivan Rojas

1622 S Poplar St.

Santa Ana, California 92704

USPS Parcel: EI 979 728 322 US (Parcel 7)

Addressed To: Stanley Chen

1401 Wilcox Ave.

Monterey Park, CA 91755

USPS Parcel: EI 329 267 096 US (Parcel 8)

Addressed To: Romario Haughton

2028 E 5th St.

Ontario, CA 91764

USPS Parcel: 9505 5113 3042 5028 9022 97 (Parcel 9)

Addressed To: HHC Electronics

1338 Electra Ave.

Rowland Heights, CA 91748-2335

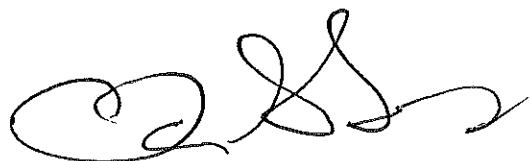
USPS Parcel: EI 504 095 603 US (Parcel 10)

Addressed To: Yesenia Jara

2718 ½ Lanfranco Street

Los Angeles, California 90033-4427

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at City of Industry, California, on February 4, 2025.

A handwritten signature in black ink, appearing to read "Yesenia Jara".